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Attorney for Petitioner United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES,

Plaintiff,

v.

BABAK BROUMAND AND
MALAMATENIA MAVROMATIS,

Defendants.

Case No.CR-21-00162-WHO

**STIPULATION TO CONTINUE
STATUS CONFERENCE FROM
AUGUST 10, 2023 AT 1:30 PM TO
SEPTEMBER 28, 2023 AT 1:30 PM,
AND EXCLUDE TIME UNDER THE
SPEEDY TRIAL ACT; AND
[PROPOSED] ORDER**

STIPULATION

The parties hereby stipulate that the currently set status conference be continued from August 10, 2023, at 1:30 p.m. to September 28, 2023, at 1:30 p.m. Defendant BABAK BROUMAND is in custody in the Central District of California, serving a 72-month sentence,

STIPULATION AND [PROPOSED] ORDER
United States v. Broumand, et al;
Case No. CR-21-00162-WHO

1 after being convicted at jury trial in *United States v. Broumand*, 20-224-RGK(A). Defendant
2 MALAMANTENIA MAVROMATIS is not in custody.

3 1. Defendant BABAK BROUMAND is in custody in the Central District of
4 California after being convicted at jury trial in the related case of *United States v. Broumand*,
5 20-224-RGK(A).
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7 2. The government has produced over 60,000 pages of discovery to defendant
8 MAVROMATIS, which primarily consists of business records, including bank, credit card,
9 mortgage broker, title company, and escrow company records, tax returns, and witness
10 interview reports.
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12 3. On March 24, 2022, the government obtained a superseding indictment in this case
13 adding defendant MAVROMATIS, who first appeared in this case on April 19, 2022, in
14 which she was charged with two counts of False Statements on a Loan Application in
15 violation of 18 U.S.C. § 1014 (Counts Four and Six). Prior to defendant MAVROMATIS's
16 indictment, co-defendant BABAK BROUMAND had already been charged.
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18 4. Additionally, counsel for both defendants agree that additional time is needed for
19 meaningful preparation for trial, including additional research and investigation, and
20 discussions with their clients and the government regarding possible pretrial resolution. The
21 parties are currently engaged in earnest pretrial resolution discussion that may obviate the need
22 for trial.
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24 5. The government and counsel for the defendants agree that time be excluded under
25 the Speedy Trial Act so that defense counsels can continue to prepare for trial and engage in
26 pretrial resolution discussions.
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1 6. The parties stipulate and agree that excluding time until September 28, 2023, will
2 allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
3 further stipulate and agree that the ends of justice served by excluding the time from August
4 10, 2023, through September 28, 2023, from computation under the Speedy Trial Act outweigh
5 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),
6 (B)(iv).
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8 7. The parties are also discussing resolution of this entire matter and require more time
9 to discuss different settlement alternatives. The parties believe that they are close to reaching
10 a pretrial resolution.
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8. The undersigned Assistant United States Attorneys certify that they have obtained approval from all counsel to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: August 8, 2023

/s/ Michael J. Morse
MICHAEL J. MORSE
JUAN M. RODRIGUEZ
Special Assistant United States Attorney

DATED: August 8, 2023

/s/ Steven F. Gruel
STEVEN F. GRUEL
Counsel for Defendant BROUMAND

DATED: August 8, 2023

/s/ Paul H. Nathan
PAUL H. NATHAN
Counsel for Defendant MAVROMATIS

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the status conference from August 10, 2023, at 1:30 p.m. to September 28, 2023, at 1:30 p.m.

Furthermore, the Court finds that failing to exclude the time from August 10, 2023, through September 28, 2023, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from

1 August 10, 2023, through September 28, 2023, from computation under the Speedy Trial Act
2 outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and
3 with the consent of the parties,
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5 IT IS HEREBY ORDERED that the time from August 10, 2023, through September
6 28, 2023, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
7 3161(h)(7)(A), (B)(iv).
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9 IT IS SO ORDERED.
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12 DATED:

HONORABLE WILLIAM H. ORRICK
United States District Court
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